Creating a Culture of Compliance Through Effective Program Structure
2012 HCCA Compliance Institute

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Tenet Healthcare Corporation is one of the largest investor-owned health care delivery systems in the nation.
• 50 hospitals in 11 states
• 99 outpatient centers
• 57,000 employees
• $8.854 billion net operating revenues (CY’11)
• 515,693 admissions (CY’11)
• 4 million outpatient visits (CY’11)

Our values: quality, integrity, service, innovation and transparency
Defining Compliance in Eight Key Areas

- Healthcare is compliant when it is:

Is Documented, Charged and Billed Correctly

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<th>Is Provided in an Approved Facility</th>
<th>Promotes Patient Rights</th>
<th>Is Reimbursed Correctly</th>
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Is Provided Without Financial Incentives

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<th>Is Medically Necessary</th>
<th>Is Provided by Qualified Physicians/Staff</th>
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Meets Quality Standards
History of Compliance Program

- Compliance Program Established 2004
- Decentralized Model - First for-profit health system to place independent full-time Compliance Officers in all hospitals
- Corporate Integrity Agreement (CIA) 2006-2011
- First CIA to include Quality of Care component
- Establishment of Quality, Compliance and Ethics Program Charter September 2011
  (The Charter applies to any facility of business in which Tenet owns an interest of 51% or more or for which Tenet manages the day to day operations of the facility or business)

Compliance Committee Members

- Home Office (Management Quality Compliance and Ethics Committee)
  - SVP & CCO - Chair
  - President Hospital Operations
  - SVP Quality
  - SVP Operations Finance
  - SVP General Counsel
  - SVP Human Resources
  - Deputy General Counsel
  - Corporate Compliance Officer
  - VP Audit Services
  - VP Quality Management
  - VP Safety and Risk
  - VP CNO
  - VP Government Programs
  - Senior Directors (Case Management, Ethics Action Line, Conifer Revenue Solutions)
• Hospital
  - CEO
  - COO
  - CFO
  - CNO
  - CMO
  - HCO Chair
  - Risk Manager
  - Director Quality
  - Department Directors

• System-wide Standards (Code) of Conduct
• Education and Training
• Hospital Leadership Certifications (quarterly)
• Collaboration with Audit Services
• Auditing and Monitoring
• Compliance Effectiveness Review (annually)
• Clinical Systems Review (annually)
• Referral Source Arrangements Review (annually)
• Screening for Exclusions (in collaboration with Human Resources)
• Management of Company Policies and Procedures
• Investigation, Response and Prevention
• HIPAA Privacy and Security
• Deficit Reduction Act
• Quality Reportable Events and Overpayments
• Compliance Issue Management and Reporting System
• Ethics Action Line
• Enforcement and Discipline (in collaboration with Human Resources)
• Risk Assessments
• Ethics and Compliance Work Plan (annually)
• Inpatient & Outpatient Coding Audits
• Ethics and Compliance Annual Report to Tenet Board

• Performance Standards and Incentives
  – Component of employee annual evaluation
  – Hospital Compliance Scorecard (sixteen metrics)
  – Hospital Compliance Officer Scorecard (twelve metrics)
  – Clinical Quality Measures
  – Balanced Scorecard (Company-wide including quality and operational performance metrics)

• Incentive and Bonus Awards are linked to scorecard results
• High Level Oversight and Engagement
• Provide an Opportunity for Middle Management and Staff Participation in Compliance Activities
• Require Accountability
• Create a Culture of Teamwork
• Be Responsive
• Take Advantage of Opportunities to Build Relationships
• Prioritize based on organizations unique characteristics
• Be Visible
• Measure Effectiveness

http://www.tenethealth.com/about/pages/ethicscompliance.aspx

Website Content related to Ethics and Compliance Program:
  ➢ Overview of Ethics and Compliance program
  ➢ Policies and Procedures
  ➢ Quality Compliance and Ethics Program Charter
Questions